

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

Case No. 19-03855-EAG

LUIS A. TORRES CRUZ

Chapter 13

Debtor (s)

_____ /

APPLICATION FOR COMPENSATION OF ATTORNEY FOR DEBTOR

TO THE HONORABLE COURT:

COMES NOW, the undersigned counsel for the above captioned case and respectfully states, prays and requests as follows:

1. On July 1, 2019, Debtor retained the undersigned counsel Alexandra Rosario Morell, of Collazo & Rosario Law Firm to render legal services with respect to the above captioned matter. The petition for relief under the Chapter 13 of the Bankruptcy code was filed on the same day.
2. Counsel of Record agreed to undertake the herein mentioned legal representation at a Minimum flat fee of \$4,000.00 up to the confirmation of the Plan. Prior to the commencement of this case the undersigned received \$250.00 for attorney's fees, as disclosed in form 2016(b) and item 16 part 7 of the SOFA. The aforesaid rates are considered to be reasonable, considering the nature of this cause and the work performed, and are the same rates charged to non-bankruptcy clients for similar services.
3. The source of the funds to be paid to Applicant by Debtor shall be from the balance on hand that the Chapter 13 Trustee assigned to the case maintains made by the Debtor.
4. The Debtor's legal counsel has not received any additional attorney's fees for the services rendered and/or the reimbursement of expenses sought, previously described in more detail in the attached invoice refer herein as Exhibit A. The invoice total is \$2,000.00 and it reflects 10 hours of work, yet additional services were provided, however there are no funds available for this excess. All expenses

were provided by COLLAZO & ROSARIO LAW FIRM and no reimbursement was charged.

5. There are no agreements on the part of the Applicant for the sharing of any of the compensation received or to be received.
6. We are requesting to this Honorable Court to approve our petition in the amount of \$2,000.00 of which \$250.00 were paid pre-petition, for a balance of \$1,750.00.
7. Debtor will not reach confirmation because he has not able to comply with plan payments.

CERTIFICATION BY THE ATTORNEY

1. I have read the application attached hereto.
2. To the best of my knowledge, information and belief, formed after reasonable inquiry, the compensation and reimbursement of expenses sought conforms with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the United States Trustee Guidelines and the Local Bankruptcy Rules.
3. The compensation and reimbursement of expenses requested are billed at rates no less favorable to the debtor/estate than those customarily employed by the applicant generally.
4. Prior to the filing the instant request for compensation, the debtor has had a meaningful opportunity to review the fees billed herein and has approved their payment.

WHEREFORE, it is respectfully prayed that an order be entered approving the instant application for compensation of **\$2,000.00** of which **\$1,750.00** are due to be paid to COLLAZO & ROSARIO LAW FIRM by the Chapter 13 Trustee from any funds he might have available on hand in the instant case.

NOTICE TO CREDITORS AND PARTIES IN INTEREST, within twenty-one (21) days after service as evidence by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an

objection or other appropriate response to this paper with the Clerk's office of the US Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: DEBTORS AND UNDERSIGNED ATTORNEY HEREBY CERTIFY: that this motion has been filed using the Bankruptcy Court's ECM/ECF electronic filing system which will automatically notify all participants to said system including the Office of the U.S. Trustee and the Chapter 13 Trustee. I HEREBY CERTIFY THAT all other parties included in attached master address list who are not participants of the Court's automatic filing system have been notified of this motion via regular mail sent on this same date.

RESPECTFULLY SUBMITTED

IN COAMO, PUERTO RICO, this 20th day of July 2020.

COLLAZO & ROSARIO LAW FIRM

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